

FILED
HARRISBURG, PA

FEB 06 2023

IN THE
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PER

DEPUTY CLERK

George Ivan Lopez, et al.,	*	
Plaintiff,	*	Honorable Chistopher C. Conner
Vs.	*	Hon. M.J. Karoline Mehalechick
John Wetzel et al.,	*	
Defendants..	*	No. 3:21-cv-1819

CERTIFICATE OF GOOD FAITH

Honorable Christopher C. Conner, please be advised that this is a ***certificate of good faith***, in the hope and prayer that this Honorable Court can exercise its Judicial power and intervene by either bringing sanction against the defendants for failure to comply with Federal Rule of Civil Procedure (34) (discovery proceedings). And/or Grant the Plaintiff's Motion to compel discovery and appointment of counsel.

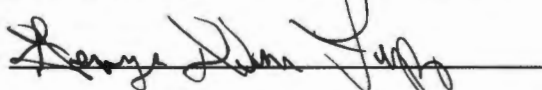
The defendants have been requested to produce discovery material both informal and formally and still have refused to comply with the Discovery request with repeated motions to stay discovery, and lying to the Court that Plaintiff can ascertain discovery material through the Department itself, when policy clearly states that prisoners cannot have copies of our medical/mental records while incarcerated unless its by Court-Order.

The Plaintiffs are being handicap by defendants counsel's refusal to produce any and all requested discovery material which are crucial and relevant to rebuttal the defedants arguments that they (a) didn't violate the Plaintiffs

Eighth, ADA and fourteenth amendment to the United States Constitution and (b) that they did not have any knowledge that keeping the Plaintiffs under solitary confinement could cause mental and physical injuries when they have had the full subjective and objective knowledge for decades that solitary confinement cause mental injuries. The Requested discovery material can and will support each and very one of the Plaintiffs Claims raised in the complaint. This court consolidated both Lopez V. Wetzel and Spatz V. Wetzel for the purpose of pre-trial discovery and the defendants still refuses to comply with discovery procedures.

WHEREFORE, Plaintiff respectfully move this Honorable Court pursuant to this Certificate of Good Faith and prayer for the Court to either grant the Pending Motion to compel discovery defendants and or bring sanction against defendants for failure to comply with F.R.C.P 34.

RESPECTFULLY SUBMITTED THIS 2TH DAY OF FEBRUARY 2023

A handwritten signature in black ink, appearing to read "George Ivan Lopez", is written over a horizontal line.

GEORGE IVAN LOPEZ, CZ-3198

PRO SE

1200 MOKICHIC DRIVE
COLLEGEVILLE PA. 19426

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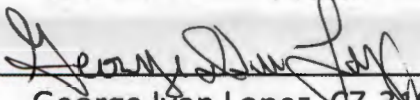
CERTIFICATE OF SERVICE

I, the undersign, hereby certisfy, that on this 2th day of February, 2023, I
have served a true and correct copy of the attached Plaintiffs' certificate of good
faith to compel discovery, service by pre-paid first class postage

First Class Postage:

Defendant's Counsel
Kimberly Adam,
1920 Technology Parkway
Collegeville, Pa. 19426

RESPECTFULLY SUBMITTED


George Ivan Lopez, CZ-3198
1200 Mokychic Drive
Collegeville, Pa. 19426

Dated: 2/2/2023

~~Strickland v. Holman~~

SCI- Phoenix

Name *George Lopez*

Number *CZ-3197*

PO Box ~~████~~ *244*

~~Coleman, David~~
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*To: United States District Court
For The Middle District of Pennsylvania
228 Box 983
Harrisburg, Pa. 17108*

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